## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)

### **BROWN RUDNICK LLP**

Kenneth J. Aulet, Esq. (admitted *pro hac vice*) Seven Times Square New York, New York 10036 (212) 209-4800 kaulet@brownrudnick.com

#### **BROWN RUDNICK LLP**

Tristan Axelrod, Esq. (admitted *pro hac vice*) One Financial Center Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com

General Counsel for the Plan Administrator

### GENOVA BURNS LLC

Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com

Local Counsel for the Plan Administrator

In re:

BLOCKFI INC., et al.,

Debtors.1

### HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Lauren M. Sisson, Esq. (NJ Bar No. 394182022) 30 Rockefeller Plaza, 26th Floor New York, New York 10112 (212) 659-7300 richard.kanowitz@haynesboone.com lauren.sisson@haynesboone.com

Attorneys for the Plan Administrator

## Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered under a Confirmed Plan<sup>2</sup>)
Hearing Date: January 25, 2024 @ 10:00 a.m. ET
Response Deadline: January 18, 2024 @ 4:00 p.m. ET
Oral Argument Waived Unless Response Timely Filed

# CERTIFICATION OF FLORI MARQUEZ IN SUPPORT OF WIND-DOWN DEBTORS' OBJECTION TO CLAIM FILED BY THE CONNECTICUT DEPARTMENT OF BANKING

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>&</sup>lt;sup>2</sup> On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the "Plan") [Docket No. 1609].

- 1. I, Florencia Marquez, pursuant to 28 U.S.C. § 1746, declare:
- 2. My name is Florencia ("Flori") Marquez. I am over the age of 21. I am the Chief Operating Officer for the wind-down debtors (collectively, "BlockFi" or the "Wind-Down Debtors") in the above-captioned Chapter 11 Cases. Accordingly, I am in all respects competent to make this certification (the "Certification").
- 3. I submit this Certification in support of the *Debtors' Objection to Claim Filed by the Connecticut Department Banking* (the "Objection") filed contemporaneously herewith.
- 4. Except as otherwise indicated herein, the facts set forth in this Certification are based upon my personal knowledge, my review of relevant documents, information provided to me by the professionals in this case and/or employees working under my supervision, or my opinion based upon my experience, knowledge, and information concerning the Wind-Down Debtors' operations. I am authorized to submit this Certification on the Wind-Down Debtors' behalf. If called upon to testify, I would testify competently to the facts set forth in this Certification
- 5. I have read and reviewed the Objection, including the information regarding the claim set forth on <u>Schedule 1</u> to the Proposed Order attached thereto, and I am familiar with the information contained in those documents. In consultation with the Wind-Down Debtors' advisors, I have concluded that the claim is unliquidated and one for which the Wind-Down Debtors are not liable.
- 6. Accordingly, to prevent improper recovery against the estates, I believe that the Proposed Order should be granted and that the claim should be disallowed, as detailed on <u>Schedule 1</u>.

Case 22-19361-MBK Doc 1942-2 Filed 12/06/23 Entered 12/06/23 20:02:23 Desc Exhibit A - Certification of Flori Marquez in Support of Wind-Down Debtors Page 3 of 3

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 6, 2023 By: /s/Flori Marquez

Flori Marquez

Chief Operating Officer to the Wind-Down Debtors